

Privacy Notice

Version 2.0
January/2024





1 - Introduction:

TAG develops the entire system with a focus on convenience and practicality, both for the hotel and the guest. Since the initial project, concern for user privacy has been incorporated to ensure the safety of all customers who use our features.

With the aim of clarifying in detail and transparently our commitment to the protection of privacy and personal data, we have prepared this PRIVACY POLICY. This document represents a legal statement to demonstrate TAG's commitment to compliance with the General Data Protection Law (LGPD), Law No. 13,709/2018, and the General Data Protection Regulation (GDPR), EU 2016/679.

The Privacy Policy clarifies our procedures and practices regarding the collection and use of user personal data, details your rights as a data subject, and makes it clear how we safeguard the integrity and security of the information we store, evidencing compliance with the transparency principle of LGPD and GDPR.

Our policy covers all personal data of guests who use our system to automate hotel processes. Therefore, it details how and why we may collect, use, process, share, and retain the personal information you provide to us. Additionally, we clarify who has access to the data, the purposes for which it is handled, and how you can control the sharing of your information.

By using TAG's services, you agree to the collection and use of information in accordance with this policy. Unless defined differently in this Privacy Policy.

2 - Data Protection Contact:

We are always available to clarify any doubts or provide information about TAG's policies and practices related to privacy and personal data protection. We make the contact information of our Data Protection Officer readily available in a clear and objective manner.

Feel free to contact us via email or phone below to address any issues related to data protection and privacy:

Data Protection Officer: Lucas Boaventura Menezes

Phone / WhatsApp: (34) 99979-9099

Email: lucas@tag.express

3 - Definitions:

Below, we present some definitions with the aim of clarifying the terms we use:

PERSONAL DATA: Information related to an identified or identifiable natural person.

SENSITIVE PERSONAL DATA: Personal data about racial or ethnic origin, religious belief, political opinion, membership of a trade union or of a religious, philosophical or political organization, data concerning health or sex life, genetic or biometric data, when linked to a natural person.

DATA SUBJECT: Natural person to whom the personal data being processed refers.

PROCESSING: Any operation performed with personal data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation, or control of information, modification, communication, transfer, dissemination or extraction.

PURPOSE: Carrying out the processing for legitimate, specific, explicit, and informed purposes to the data subject, without the possibility of further processing incompatible with these purposes.

NECESSITY: Limitation of processing to the minimum necessary for the accomplishment of its purposes, with scope of relevant, proportional, and not excessive data in relation to the purposes of data processing.

QUALITY: Guarantee to data subjects of accuracy, clarity, relevance, and updating of data, as necessary and for the fulfillment of the purpose of its processing.

TRANSPARENCY: Guarantee to data subjects of clear, accurate, and easily accessible information about the processing and the respective data processing agents, observing commercial and industrial secrets.

CONTROLLER: Natural or legal person, public or private, who is responsible for decisions regarding the processing of personal data.

PROCESSOR: Natural or legal person, public or private, who processes personal data on behalf of the controller.

LEGAL BASES: Legal bases are the hypotheses that allow and legitimize data processing operations. All operations we perform on your data are supported by one of the 10 processing hypotheses of the law.

CONSENT: Free, informed, and unequivocal expression by which the data subject agrees to the processing of their personal data for a specific purpose.

COOKIES: Small pieces of data stored on your device (computer or mobile device).

4 - Data Collected and Received

According to Decree No. 7,381, dated December 2, 2010, which regulates the Tourism Law No. 11,771/2008, the daily movement of guests must be declared through the National Guest Registration Form (FNRH). Therefore, the application of the FNRH is mandatory for all lodging establishments in Brazil. Thus, the data collected and/or received by TAG are the data listed in the FNRH.

Personal Data:

When using our Service, we may ask the user to provide certain personally identifiable information that can be used to contact or identify them ("Personal Data"). Personal identification information may include, but is not limited to:

- Full Name;
- Date of Birth;
- Age, Occupation, and Gender;
- Mobile, Telephone, and Email;
- Identification Document (Travel Document), Type, Issuing Authority (Issuing Country), ID Number, Tax ID (CPF);
- Nationality, Permanent Address, City, State, Country;
- Vehicle Plate, Last Origin, Next Destination, Travel Purpose, Means of transportation;
- Guest's signature;
- Cookies and usage data.
-

In addition to these, we also collect the guest's face photo (Selfie) and satisfaction survey responses (NPS). However, the requested face photo will be necessary as a means of authenticating the user's identity and satisfaction survey responses are not mandatory.

Tracking Data and Cookies:

We use cookies and similar technologies to enable services and features on our website and to understand interaction with our service.

We regularly monitor aggregated activity data on our infrastructure, but we do not track individual users in the sense of this paragraph, which only occurs when we have a legitimate interest in doing so (for example, for security and compliance purposes).

We perform regular tracking on our Open Server. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.



Privacy Notice -TAG

Version 2.0 - January/2024

Cookies we use:

Essential Cookies: These cookies enable essential functions such as security, identity verification, and network management. These cookies cannot be disabled;

Marketing Cookies: These cookies are used to track the effectiveness of advertising, provide more relevant service, and deliver better ads to meet your interests;

Functional Cookies: These cookies collect data to remember user choices and to improve and provide a more personalized experience;

Analytical Cookies: These cookies help us understand how visitors interact with our website, discover errors, and provide better overall analysis.

How We Use the Information?

As established by law, we collect and use user's personal data to comply with legal and regulatory obligations, such as:

- Compliance with court orders or requests from competent authorities;
- Response to regulatory agency requirements;
- Investigation and prevention of fraud or illegal activities.

Furthermore, the data collected through our website, our application, and the integration of our system with hotel systems, serve the following PURPOSES:

- Online check-in, with confirmation on behalf of the hotel, offering guests convenience and practicality.
- Online check-out, with the implementation of a satisfaction survey where the guest evaluates the services provided by the hotel.
- Providing the hotel with the opportunity to strengthen its relationship with guests through marketing campaigns, promotions, and loyalty programs, intelligently coordinating its operations.

We employ the user's personal data to the extent required to conduct our operations, deliver our services, and comply with all relevant regulatory obligations related to our activities. Thus, in accordance with the principle of NECESSITY, we limit the collection only to essential information for the provision of TAG's contracted services.

It is important to note that, should the user choose not to provide us with the personal data mentioned above, it will not be possible to continue with the described processes.

Data of underage guests:

Regarding the data of underage guests, in accordance with the treatment hypotheses provided:



Privacy Notice -TAG

Version 2.0 - January/2024

- We process personal data of children and adolescents in their best interest, in accordance with the dictates of relevant data protection legislation;
- We make public the information about the types of data collected, how they are used, and the procedures for exercising rights;
- We do not disclose children's personal data to third parties without the explicit, specific, and prominently highlighted consent provided by at least one parent or legal guardian. To store the data in our system, we will do so through a consent form to be signed by the guardian;
- We do not condition children and adolescents' participation in games, internet applications, or other activities on the provision of personal information beyond what is strictly necessary for the activity;
- We provide information about data processing in a simple, clear, and accessible manner, considering the user's physical, motor, sensory, perceptual, intellectual, and mental characteristics, using audiovisual resources when appropriate, to provide the necessary information to parents or legal guardians and to be understood by the child.

That being said, the collection and all processing operations resulting from it follow the following legal basis:

Compliance with legal or regulatory obligation: in accordance with the regulations of the Ministry of Tourism;

5 - Storage, Archiving, Transmission, Transfer, Sharing

Since the collection, personal data is transferred to our system's databases, through online transmission via the Internet to Amazon Web Services cloud, where they are stored and archived. TAG does not store or archive data on paper.

Only control data, such as full address, CPF, and email, are shared with third-party platforms (for example, the sub-acquirer IUGU for check-out processing). The guest's credit card data go directly from the browser to IUGU, are not stored in TAG. It is worth mentioning that IUGU is a PCI DSS compliant company.

Data sharing is only done with the hotel where the reservation was made. No personal data is shared with other hotels.

Under no circumstances do we provide the collected data for advertising on third-party websites. The collected information is kept exclusively with TAG and the hotels chosen by the user.

In accordance with Law 11.771/2008 and Decree 7.381/2010, check-ins and check-outs must be kept indefinitely by the hotel and entered into SNRHos, the



Privacy Notice -TAG

Version 2.0 - January/2024

National Guest Registration System of the Ministry of Tourism. Therefore, for the convenience of the hotel, personal data is archived indefinitely.

The transmission of the content of personal data may occur compulsorily for the enforcement of the law, in rare circumstances, according to a valid request from the authorities. However, the request will only be fulfilled if it is made in accordance with applicable laws and regulations.

6 - Production

When making a reservation, various control data are produced, such as reservation identifier, expected check-in date, number of rooms, daily rates, hotel code, list of guests in the reservation, among other information.

The PURPOSE of this data is to perform online check-in and check-out allowing integration between systems correctly, maintaining data accuracy for that there is no conflict or incorrect information, in accordance with the principle of QUALITY.

7 - Access, Use, and Modification

The system allows the user to access the information and processed data.

The use of personal data and data produced by TAG is aimed at automating check-in and check-out. The system also utilizes the CRM tool, which allows the hotel to use personal data for sending communications and personalized marketing campaigns, and the NPS tool for satisfaction surveys.

To correct the registration, the user may request that the hotel modify it appropriately if they consider that the personal data are incomplete or incorrect.

8 - Processing, Extraction, Evaluation, or Control of Information

The processing activities carried out on the data involve only storing them in databases, backing up this data, and cross-referencing data for analysis of guest consumption behavior.

TAG allows the hotel to extract reports from the system, the information in which is evaluated by hotel managers for managing their operations and producing their marketing campaigns. These reports may present information based on anonymized data but may also specifically indicate the preferences of a particular guest. However, this analysis is only within the context of the hotel, meaning that this information is not summarized or traded "between" hotels in any way. Therefore, it is managerial information about the satisfaction of that guest with that hotel.

9 - Elimination or Anonymization

No personal data is eliminated in accordance with State regulations. According to Law 11.771/2008 and Decree 7.381/2010, check-ins and check-outs must be kept indefinitely by the hotel and entered into the SNRHos, the National Guest Registration System of the Ministry of Tourism.

TAG also enables, upon request made by the data controller via email, the viewing, deletion, and anonymization of data entered into our platforms. Anonymized data, meaning data that can no longer be associated with an individual, may be used for research and statistical purposes, and in this case, TAG may use this information indefinitely without prior notice.

10 - Rights of the Data Subject

LGPD and GDPR ensure specific rights to all citizens regarding their personal data. According to Article 18 of LGPD, the CONTROLLER must provide these rights to data subjects. TAG, in the role of OPERATOR, is required by law to process data in accordance with the policies of the CONTROLLER. Any requests from data subjects regarding their data and their rights should be submitted free of charge, through a request by email or phone to our Data Protection Officer, whose contact details are detailed in item 2 of this policy.

For your security, whenever the user submits a request to exercise their rights, TAG may request some additional information and/or documents to verify your identity, aiming to prevent fraud. We do this to ensure the security and privacy of everyone involved.

In some cases, TAG may have legitimate reasons for not fulfilling a request to exercise rights. These situations include, for example, cases where disclosure of specific information could violate intellectual property rights or business secrets, whether ours or third parties'. Other examples are cases where requests for data deletion cannot be fulfilled due to TAG's obligation to retain data, either to comply with legal or regulatory obligations or to enable its own defense or that of third parties in disputes of any nature.

Additionally, some requests may not be immediately answered, but TAG commits to responding to all requests within a reasonable timeframe and always in accordance with applicable law.

11 - Opposition or Review of Data Processing



Privacy Notice -TAG

Version 2.0 - January/2024

Consent consists of free (data subjects must have the option to consent or not consent), informed (data subjects must be well-informed about the processing they are consenting to), and unambiguous (data subjects cannot have doubts about their consent) manifestation.

Therefore, the customer may revoke consent at any time, which does not render the processing performed while consent is valid illegal, and may exercise this right by request through TAG's channels.

12 - Data Protection

Protecting the data entrusted to us by our clients, users, and partners is our priority. We employ a variety of technical and organizational measures to ensure the security of your personal data. These measures include physical, administrative, and technological precautions to mitigate the risk of loss, misuse, or unauthorized access, disclosure, or alteration of your personal information. Access to your data is restricted only to individuals whose roles require this specific need.

Additionally, all TAG employees are required to undergo information security training, are subject to background checks, and are obligated to sign a binding confidentiality agreement.

Despite our efforts, due to the nature of communications and information processing technology, we cannot guarantee that information will be completely secure against third-party intrusions during its transmission over the Internet or while stored in our systems.

13 - Changes to this Privacy Policy

This privacy policy is subject to changes and updates, if we ever need them and to always ensure compliance with the law, through the offering of new businesses and services, where the use of personal data or sensitive personal data is necessary. These changes may occur at any time.

This policy is effective from January/2024.